

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

JANE DOE, JOHN DOE.)
Plaintiffs) Case No.3:24-cv-274 (MAD/ML)
-against-)
JONATHAN REES aka GREG ELLIS)
aka JOHNATHAN REES aka JONNY REES)
aka JACOB LORENZO)
Defendant)

)

**DECLARATION OF
JOHN DOE**

DECLARATION OF JOHN DOE IN SUPPORT OF REPLY FOR DEFAULT JUDGMENT

I, JOHN DOE, declare under penalty of perjury that the foregoing is true and correct:

1. I am the Plaintiff in the above-captioned action and submit this Declaration in support of Plaintiffs reply to Motion for Default Judgment against Defendant Jonathan Rees aka Greg Ellis aka Johnathan Rees aka Jonny Rees aka Jacob Lorenzo.
2. Defendant reaching out to my school and friends via himself and his friends with false information about my mom and dad, has caused me significant harm, embarrassment and bullying.

3. I was removed from my School for a significant period of time on two separate occasions while the School investigated the allegations Defendant contacted my School Counselor about. This has disrupted my school work and my ability to graduate with my friends.

4. The video of my mom circulated around my School with my peers screen recording and sharing it to other students, using the video to bully me, my brother and my sister.

5. The stress of being interviewed by CPS Officers more than 6 times, Police showing up at the house multiple times after receiving calls about crimes my mom and my younger brother had allegedly committed, harassed by the Landlord at the time, and kids in my school, all instigated by Defendant, I started to experience bad headaches and the doctor referred me to a neurologist for further investigation. I struggled to cope moving from hotel to hotel while studying for my Regents exams on top of Defendant actively looking for us, that I moved away from my mom and siblings for the rest of the School year, approximately 2 months.

6. I didn't want or expect to leave home before going to college, but I had to, I was getting ill, felt low, bad headaches, that I collapsed two times playing tennis, which has never happened to me before. My mom was devastated by what was happening to me and didn't want me to move away from her, believing I was safer with her given everything that was happening.

7. I did move back with my mom and me and my siblings moved to a new School. We took a lot of precautions to protect ourselves from Defendant and his friends and I started to relax and feel happy again, enjoying my new school in Honor classes, but 3 weeks ago, Defendant located us again and doxed us online. I immediately left School as I do not want to go through the embarrassment again with new friends and other students receiving the videos again and bullying me, calling my mom a killer and that my dad sexually abused me, when it's not true.

8. I plan to return to School and graduate after Defendant leaves us alone and we can get back to living like we did prior to meeting Defendant.

Executed on January 6, 2025.

J. Doe

John Doe

Plaintiff